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Attorneys for Defendants
ETHICON, INC. and
JOHNSON & JOHNSON

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CHERI SHELTON,

Plaintiff,

v.

JOHNSON & JOHNSON and ETHICON,
INC.,

Defendants.

) Case No. 2:21-cv-00423-TLN-AC

) **JOINT NOTICE OF SETTLEMENT
AND REQUEST FOR STAY**

**TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Plaintiff, Cheri Shelton, and Defendants Ethicon, Inc. and Johnson & Johnson (collectively, the “Parties”), by and through their undersigned counsel, notify the Court that a settlement in principle has been reached. It will likely take 120 days before the settlement of the case will be finalized. As a result, the parties jointly request that the case be moved to inactive status and/or that all deadlines and other requirements be stayed, until such time as the settlement can be concluded and the case can be dismissed with prejudice.

DATED: January 28, 2022

BARON & BUDD, P.C.

By: /s/ David B. Fernandes

David B. Fernandes

Attorneys for Plaintiff

CHERI SHELTON

DATED: January 28, 2022

TUCKER ELLIS LLP

By: /s/ Joshua J. Wes

Joshua J. Wes

Attorneys for Defendants

JOHNSON & JOHNSON and

ETHICON, INC.

SIGNATURE ATTESTATION

I attest that all other signatories listed, and on whose behalf this filing is submitted,
concur in the filing's content and have authorized the filing.

DATED: January 28, 2022

TUCKER ELLIS LLP

By: /s/ Joshua J. Wes

Joshua J. Wes

Attorneys for Defendants

JOHNSON & JOHNSON and

ETHICON, INC.

CERTIFICATE OF SERVICE

I declare that I am a citizen of the United States and a resident of Los Angeles, California or employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Tucker Ellis LLP, 515 South Flower Street, Forty-Second Floor, Los Angeles, California 90071-2223.

On **January 28, 2022**, I served the following: **JOINT NOTICE OF SETTLEMENT AND REQUEST FOR STAY** on the interested parties in this action by:

- (X) **ELECTRONICALLY VIA ECF:** the above-entitled document to be served electronically through the United States District Court, Eastern District ECF website, addressed to all parties appearing on the Court's ECF service list. A copy of the "Filing Receipt" page will be maintained with the original document in our office.
- (X) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on **January 28, 2022**, at Los Angeles, California

/s/ Joshua J. Wes
Joshua J. Wes